

Attorney for Debtor
Pia J. North, Esq. #29672
North Law
5913 Harbour Park Drive
Midlothian, VA 23112
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Help@PiaNorth.com

**United States Bankruptcy Court
Eastern District of Virginia
Richmond Division**

In re: Shonda L. White, Debtor
115 E. Broad Street #101
Richmond, VA 23219
Last 4 of SSN: xxx-xx-3724

Case#: 20-34669
Bruce E. Robinson, Trustee
Chapter: 7

MOTION TO EXTEND AUTOMATIC STAY

Comes Now, Debtor, Shonda L. White, by counsel, Pia J. North, Esq. and states the following in support of this Motion to Extend the Automatic Stay:

1. On, November 23, 2020, the Debtor filed in this Honorable Court a petition for relief under Chapter 7 of the Bankruptcy Code, 11 U.S.C. § 1301 et seq. (the “instant case”). The automatic stay will expire in the instant case on December 23, 2020, unless the Court extends the automatic stay pursuant to 11 U.S.C.362 (c)(3)(A) and (B).
2. Bruce E. Robinson was appointed to serve as Chapter 7 Trustee in this case (the “Trustee”).
3. The Debtor’s bankruptcy history does not indicate a lack of good faith. The Debtor, Shonda L. White filed three previous bankruptcies, however, only two were filed within the last eight years:
 - a. **Chapter 13 Case#: 18-34348** was filed on August 24, 2018 and dismissed on November 20, 2020 for “Failure to make plan payments”. That case was pending within one year of the filing of this instant case, thus triggering the provision of 11 U.S.C. 362(c)(3).
 - b. **Chapter 13 Case#: 17-40856** was filed on June 7, 2017 and dismissed on August 17, 2020 for “Failure to make plan payments”.
 - c. **Chapter 7 Case#: 12-41594** was filed on August 12, 2012. The debtor received a discharge in that matter.

4. The Debtor's financial situation deteriorated when the debtor was forced to take time away from work to care for her mother. She incurred additional unanticipated expenses when she made multiple trips to and from New Jersey. Her mother has now been placed in a nursing home. Additionally, she incurred extra expenses when her unemployed son lived with her. These additional expenses and loss of income caused the debtor to fall behind in her payments to the Chapter 13 Trustee.
5. There has been a change in circumstances in that the debtor no longer has the income to support a Chapter 13 payment plan. The debtor was not eligible to convert the prior case to Chapter 7, however she's now eligible to receive a Chapter 7 discharge in the current case.
6. WHEREFORE, for the foregoing reasons, the Debtor respectfully requests that this Court enter an Order extending the automatic stay under 11 U.S.C. § 362 as to all creditors, as to the Debtor and the Debtor's property, and as to the property of the estate for the duration of this proceeding, or until such time as the stay is terminated under § 362 (c) (1) or (c) (2), or a motion for relief is granted under § 362(d) and for such other and further relief as to the Court shall be deemed appropriate.

Respectfully submitted:
Shonda L. White

By: /s/ Pia J. North
Counsel

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NOTICE OF MOTION

Pia J. North, Attorney for the Debtor having filed papers with the court: Motion to Extend the Automatic Stay.

Your rights may be affected. You should read these papers carefully and discuss **them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)**

If you do not want the court to grant the relief sought in the objection, or if you want the court to consider your views on the motion, then **on or before December 8, 2020** you or your attorney must: File with the court, at the address shown below, a written response pursuant to Local Bankruptcy Rule 9013-1(H)]. If you mail your request for hearing (or response) to the court for filing, you must mail it early enough so the court will **receive** it on or before the date stated above.

Clerk of Court
United States Bankruptcy Court
701 E. Broad Street, Room 4000
Richmond, VA 23219

Office of the U.S. Trustee
701 E. Broad Street, Room 4304
Richmond, Virginia 23219

You must also mail a copy to:

Pia J. North
North Law
5913 Harbour Park Drive
Midlothian, VA 23112

Bruce E. Robinson
P.O. Box 538
South Hill, VA 23970-0538

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion and may enter an order granting that relief.

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NOTICE

PLEASE TAKE NOTICE that on **December 9, 2020 @ 12 Noon** or as soon thereafter as is practical, we will appear before the Honorable Kevin R. Huennekens 701 E. Broad Street, Room 5000, Richmond, VA 23219 on the Debtor's **Motion to Extend the Automatic Stay.**

Shonda L. White and

BY: /s/ Pia J. North
Counsel

Certificate of Service

I hereby certify that I have on November 24, 2020, served by transmitting a true copy of the foregoing Motion to Extend the Automatic Stay, Notice of Motion and Notice of Hearing electronically through the Court's CM/ECF system or by first class mail, postage pre-paid or email to: Shonda L. White, the Debtor, the Trustee, the United States trustee and to all creditors and parties in interest on the attached mailing matrix

By: /s/ Pia J. North
Counsel

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AFFIDAVIT

I, Shonda L. White declare under penalty of perjury that the information provided in the Motion to Extend the Automatic Stay is true and correct.

1. I filed a Chapter 13 bankruptcy in August 2018. That case was dismissed in November 2020 because my financial situation got worse when my mother became ill and my son moved into my home after losing his job. I could no longer afford to make the Chapter 13 payments and pay my necessary household expenses on my income alone.
2. I filed this Chapter 7 bankruptcy because I cannot afford to pay my debts on my income alone.

WITNESS the following signature and seal on November 23, 2020.

/s/ Shonda L. White
Shonda L. White

American First Finance

Attn: Bankruptcy

Po Box 565848

Dallas, TX 75356-5848

Anesthesia Consultants

PO Box 14099

Belfast, ME 04915-4034

Capital One Auto Finance

Attn: Bankruptcy

Po Box 30285

Salt Lake City, UT 84130-0285

Capital One Auto Finance

Credit Bureau Dispute

Plano, TX 75025

Capital One Bank

PO Box 30281

Salt Lake City, UT 84130-0281

Capital One/Walmart

Attn: Bankruptcy

Po Box 30285

Salt Lake City, UT 84130-0285

Capital One/Walmart

Po Box 30281

Salt Lake City, UT 84130-0281

Carlyle At Godley Station

7948 Baymeadows Way

Jacksonville, FL 32256-8539

Cash Net USA

175 West Jackson

Suite 1000

Chicago, IL 60604-2863

Century Link

115 Patriots Trail

Hinesville, GA 31313-3431

Certegy Check Services, Inc.

11601 Roosevelt Blvd.

Saint Petersburg, FL 33716-2202

ChexSystems

Attn: Consumer Relations

7805 Hudson Rd., Suite 100

Saint Paul, MN 55125-1703

Comenity Bank/Goody's

PO Box 182789

Columbus, OH 43218-2789

Credit One Bank

PO Box 98873

Las Vegas, NV 89193-8873

DFAS

6760 E. Irvington Pl

Denver, CO 80279

Department of Education/Nelnet

PO Box 9635

Wilkes Barre, PA 18773-9635

(p)DIRECTV LLC

ATTN BANKRUPTCIES

PO BOX 6550

GREENWOOD VILLAGE CO 80155-6550

Equifax Information Services

PO Box 740241

Atlanta, GA 30374-0241

Experian

Dispute Department

P.O. Box 4500

Allen, TX 75013-1311

Fingerhut

Attention: Bankruptcy

6250 Ridgewood Road

Saint Cloud, MN 56303-0820

Genesis FS Card Services

Attn: Bankruptcy

Po Box 4477

Beaverton, OR 97076-4401

Genesis FS Card Services

Po Box 4499

Beaverton, OR 97076-4499

(p)GEORGIA DEPARTMENT OF REVENUE

COMPLIANCE DIVISION

ARCS BANKRUPTCY

1800 CENTURY BLVD NE SUITE 9100

ATLANTA GA 30345-3202

Gold's Gym

1601 Willow Lawn Drive

Unit 3A

Richmond, VA 23230-3431

Grow Financial FCU

P.O. Box 6824

Macdill Air Force Bk/

Tampa, FL 33608-6824

Grow Financial FCU

PO Box 89947

Tampa, FL 33689-0416

Grow Financial FCU

Robert L. Fisher, President

9927 Delaney Lake Drive

Tampa, FL 33619-5071

Internal Revenue Service

Lanier Collection Agency

Lanier Collection Agency

Centralized Insolvency Unit

18 Park Of Commerce Blvd

Attn: Bankruptcy

P O Box 7346

Savannah, GA 31405-7410

18 Park Of Commerce Blvd

Philadelphia, PA 19101-7346

Savannah, GA 31405-7410

Liberty Regional Med Center
462 E G Miles Pkwy
Hinesville, GA 31313-4000Memorial Health
PO Box 102500
Atlanta, GA 30368-2500Navient
Attn: Claims Dept
Po Box 9500
Wilkes-Barr, PA 18773-9500Navient
Po Box 9635
Wilkes Barre, PA 18773-9635Navy Federal Credit Union
PO Box 3000
Merrifield, VA 22119-3000OneMain Financial, Inc.
CT Corporation System
4701 Cox Road, Suite 285
Glen Allen, VA 23060-6808Onemain Financial
PO Box 1010
Evansville, IN 47706-1010Patriot Loan Company
319 W. General Screven Way
Hinesville, GA 31313-3004Patriot Loan Company
CT Corporation System
1201 Peachtree Street NE
Atlanta, GA 30361-6329Paypal
PO Box 105658
Atlanta, GA 30348-5658(p) PORTFOLIO RECOVERY ASSOCIATES LLC
PO BOX 41067
NORFOLK VA 23541-1067(p) PROFESSIONAL DEBT MEDIATION
7948 BAYMEADOWS WAY
2ND FLOOR
JACKSONVILLE FL 32256-8539Receivable Management Inc
Bankruptcy Dept/Receivables Management S
7206 Hull Rd Ste 211
Richmond, VA 23235Receivable Management Inc
Pob 17305
Richmond, VA 23226-7305Security Finance
Attn: Bankruptcy
Po Box 1893
Spartanburg, SC 29304-1893Security Finance
C/o Security Finance
Spartanburg, SC 29304Speedy Cash
3527 N Ridge Rd
Wichita, KS 67205-1212Speedy Cash
P.O. Box #780408
Wichita, KS 67278-0408(p) SPRINGLEAF FINANCIAL SERVICES
P O BOX 3251
EVANSVILLE IN 47731-3251Synchrony Bank/Care Credit
PO Box 965036
Orlando, FL 32896-5036Synchrony Bank/Walmart
Po Box 965024
Orlando, FL 32896-5024Telecom Self-reported
Po Box 4500
Allen, TX 75013-1311TransUnion
P.O. Box 2000
Chester, PA 19016-2000TransUnion Consumer Relations
2 Baldwin Place
PO Box 1000
Chester, PA 19016-1000US Attorney
919 E Main St, Ste 1900
Richmond, VA 23219-4622Urological Assoc of Savannah
230 East DeRenne Ave
Savannah, GA 31405-6736(p) W S BADCOCK CORPORATION
POST OFFICE BOX 724
MULBERRY FL 33860-0724

John P. Fitzgerald, III
 Office of the US Trustee - Region 4 -R
 701 E. Broad Street, Ste. 4304
 Richmond, VA 23219-1849

Pia J. North
 North Law
 5913 Harbour Park Drive
 Midlothian, VA 23112-2163

Shonda L. White
 115 E. Broad Street, #101
 Richmond, VA 23219-1792

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g) (4).

DirectTV
 Attn: Bankruptcy Claims
 P.O. Box 6550
 Englewood, CO 80155

Georgia Department of Revenue
 1800 Century Blvd NE
 Suite 9100
 Atlanta, GA 30345

Portfolio Recovery Assoc
 120 Corporate Blvd Ste 1
 Norfolk, VA 23502

(d)Portfolio Recovery Assoc
 PO Box 41067
 Norfolk, VA 23541

Professional Debt Mediation
 Attn: Bankruptcy
 7948 Baymeadows Way, 2nd Floor
 Jacksonville, FL 32256

Springleaf Financial Services
 547 W Oglethorpe Hwy
 Hinesville, GA 31313

W.S. Badcock Corp
 PO Box 497
 Mulberry, FL 33860

Bruce E. Robinson
 341 Dial 866-769-9218 Code: 7515089
 P.O. Box 538
 South Hill, VA 23970-0538

End of Label Matrix	
Mailable recipients	65
Bypassed recipients	0
Total	65